

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

AUTUMN CLOUD LLC

Plaintiff,

V.

OOYALA, INC.

Defendant.

C.A. No. 2:16-cv- 00853

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Pursuant to the Court's Standing Order, Regarding Proper Notification of Settlement, Plaintiff Autumn Cloud LLC and Defendant Ooyala, Inc. (collectively, the "Parties") by and through undersigned counsel, respectfully file this joint motion to stay all deadlines in which time the Parties expect to finalize the settlement agreement and file dismissal papers. The Parties respectfully requests a thirty (30) day stay of all unreachable deadlines in the Court's scheduling conference Order (Case No. 16-cv-00853 Dkt. No. 33) and a stay of the entry of a Docket Control Order. The Parties have reached an agreement in principle to resolve this litigation, including settlement of all matters in controversy between the Parties related thereto. The Parties are now working on detailed written agreements that implement the terms of the settlement. This Joint Motion is filed in the interest of expediting resolution of the case and is not filed for purposes of delay. Good cause exists for granting this Joint Motion to preserve judicial resources and efficiently resolve this case. A proposed order granting this Joint Motion is enclosed.

Dated: January 23, 2016

Respectfully submitted,

By: /s/ Alper T. Ertas

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LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 23, 2016.

/s/ Alper T. Ertas

Alper T. Ertas